

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS**

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|---------------------------------------|---|-----------------------------------|
| CONGHUA YAN, | § | CIVIL ACTION 4-23 CV-758-P |
| | § | |
| Plaintiff | § | |
| | § | |
| Versus | § | |
| | § | |
| THE STATE BAR OF TEXAS, et al. | § | |

DEFENDANT’S ANSWER TO SECOND AMENDED COMPLAINT

NOW COMES Defendant William Albert Pigg who, for Answer to the Second Amended Complaint of Plaintiff, Conghua Yan, responds as follows:

1. The allegations contained in the unnumbered paragraphs prior to Section I of Plaintiff’s Second Amended Complaint require no answer of this responding Defendant. To the extent an answer may be required, the allegations contained therein are denied in their entirety.

2. The allegations contained in Section I, numbered paragraphs 1 – 18 of Plaintiff’s Second Amended Complaint require no answer of this responding Defendant. To the extent an answer may be required, the allegations contained therein are denied in their entirety.

3. The allegations contained in Section II, numbered paragraphs 1-6 [sic] of Plaintiff’s Second Amended Complaint require no answer of this responding Defendant. To the extent an answer may be required, the allegations contained therein are denied in their entirety.

4. The allegations contained in Section III, numbered paragraphs 7-10 and 12-17 of Plaintiff’s Second Amended Complaint require no answer of this responding Defendant. To the extent an answer may be required, the allegations contained therein are denied in their entirety.

5. In answer to Section III, numbered paragraph 11 of Plaintiff’s Second Amended Complaint, Defendant admits he is a member of the State Bar of Texas, Bar Card Number

24057009. The remaining allegations contained in Section III, numbered paragraph 11 of Plaintiff's Second Amended Complaint require no answer by this responding Defendant. To the extent an answer may be required, the allegations contained therein are denied in their entirety.

6. The allegations contained in Section IV A, numbered paragraphs 18 – 43 of Plaintiff's Second Amended Complaint require no answer of this responding Defendant. To the extent an answer may be required, the allegations contained therein are denied in their entirety.

7. The allegations contained in Section IV B, numbered paragraphs 44 - 48 of Plaintiff's Second Amended Complaint require no answer of this responding Defendant. To the extent an answer may be required, the allegations contained therein are denied in their entirety.

8. The allegations contained in Section IV C, numbered paragraphs 49 - 55 of Plaintiff's Second Amended Complaint require no answer of this responding Defendant. To the extent an answer may be required, the allegations contained therein are denied in their entirety.

9. The allegations contained in Section IV D, numbered paragraphs 56 - 63 of Plaintiff's Second Amended Complaint require no answer of this responding Defendant. To the extent an answer may be required, the allegations contained therein are denied in their entirety.

10. The allegations contained in Section IV E, numbered paragraphs 64 - 66 of Plaintiff's Second Amended Complaint require no answer of this responding Defendant. To the extent an answer may be required, the allegations contained therein are denied in their entirety.

11. The allegations contained in Section IV F, numbered paragraphs 67, 68, 70, 74, and 75-77 of Plaintiff's Second Amended Complaint require no answer of this responding Defendant. To the extent an answer may be required, the allegations contained therein are denied in their entirety.

12. The allegations contained in Section IV F, numbered paragraphs 69, 71, 72, and 73 of Plaintiff's Second Amended Complaint are denied in their entirety.

13. The allegations contained in Section V A, numbered paragraphs 78-88, 90, 91, 93, 94, 96, 102, 105, and 108 of Plaintiff's Second Amended Complaint require no answer of this responding Defendant. To the extent an answer may be required, the allegations contained therein are denied in their entirety.

14. The allegations contained in Section V A, numbered paragraphs 89, 92, 95, 97, 98-101, 103, 104, 106, and 107 of Plaintiff's Second Amended Complaint are denied in their entirety.

15. The allegations contained in Section V B, numbered paragraphs 109-113, 115, 117, 119, and 121-125 of Plaintiff's Second Amended Complaint require no answer of this responding Defendant. To the extent an answer may be required, the allegations contained therein are denied in their entirety.

16. In answer to the allegations contained in Section V B, numbered paragraph 114, Defendant admits that Plaintiff filed a grievance case against him which was dismissed by the State Bar of Texas. The remaining allegations contained in Section V B, numbered paragraph 114 are denied in their entirety.

17. This responding Defendant is unable to admit or deny the allegations contained in Section V B, numbered paragraphs 116, 117, and 120 as they are vague and unintelligible. To the extent an answer may be required, the allegations contained therein are denied in their entirety.

18. In answer to the allegations contained in Section V B, numbered paragraph 118, Defendant admits that Plaintiff filed a grievance case against him which was dismissed by the

State Bar of Texas. The remaining allegations contained in Section V B, numbered paragraph 118 are denied in their entirety.

19. The allegations contained in Section VI, numbered paragraphs 126-134 of Plaintiff's Second Amended Complaint require no answer of this responding Defendant. To the extent an answer may be required, the allegations contained therein are denied in their entirety.

20. The allegations contained in Section VII, Second Claim for Relief, numbered paragraphs 135-138, 139-147, 149-160, 167-169, 171, and 173-177 require no answer of this responding Defendant except to admit that Defendant is a member of the State Bar of Texas. To the extent further answer may be required, the allegations contained therein are denied in their entirety.

21. The allegations contained in Section VII, Second Claim for Relief, numbered paragraphs 161-166, 170, and 178 of Plaintiff's Second Amended Complaint are denied in their entirety.

22. In response to the allegations contained in Section VII, Second Claim for Relief, numbered paragraph 172, Defendant admits that Plaintiff filed a grievance case against him which was dismissed by the State Bar of Texas. The remaining allegations contained in Section VI, Second Claim for Relief, numbered paragraph 172 are denied in their entirety.

23. The allegations contained in Section VII, Second Claim for Relief, Injuries, numbered paragraphs 139, 148, and 176 require no answer of this responding Defendant except to admit that Defendant is a member of the State Bar of Texas. To the extent an answer may be required, the allegations contained therein are denied in their entirety.

24. The allegations contained in Section VII, Second Claim for Relief, Injuries, numbered paragraph 179 are denied in their entirety.

25. The allegations contained in Section VII, Second Claim for Relief, Reliefs [sic], numbered paragraphs 180-203 require no answer of this responding Defendant. To the extent an answer may be required, the allegations contained therein are denied in their entirety.

26. The allegations contained in Section VII, Second Claim for Relief, numbered paragraphs 204-212 require no answer of this responding Defendant, except to admit that he is a member of the State Bar of Texas. To the extent a further answer may be required, the allegations contained therein are denied in their entirety.

27. The allegations contained in Section VII, Second Claim for Relief, Trade and Commerce, numbered paragraphs 213-215 require no answer of this responding Defendant. To the extent a further answer may be required, the allegations contained therein are denied in their entirety.

28. The allegations contained in Section VII, Second Claim for Relief, Argument in Monopoly, numbered paragraphs 216-242 require no answer of this responding Defendant, except to admit that he did not submit “any billable hours or rates” into the [second] hearing and to deny that he never submitted any pleading (See paragraph 225). To the extent a further answer may be required, the allegations contained in Section VI, Second Claim for Relief, Argument in Monopoly, numbered paragraphs 216-242 are denied in their entirety.

29. The allegations contained in Section VII, Second Claim for Relief, Effects and Injuries, numbered paragraphs 243-252 require no answer of this responding Defendant. To the extent a further answer may be required, the allegations contained therein are denied in their entirety.

30. The allegations contained in Section VII, Second Claim for Relief, Reliefs [sic], numbered paragraphs 253-274 require no answer of this responding Defendant. To the extent a further answer may be required, the allegations contained therein are denied in their entirety.

31. The allegations contained in Section VII, Third Claim for Relief, numbered paragraphs 275-295 require no answer of this responding Defendant. To the extent a further answer may be required, the allegations contained therein are denied in their entirety.

32. The allegations contained in Section VII, Fourth Claim for Relief, numbered paragraphs 296-312 require no answer of this responding Defendant. To the extent a further answer may be required, the allegations contained therein are denied in their entirety.

33. The allegations contained in Section VII, Fifth Claim for Relief, numbered paragraphs 313-317 and 325-331 require no answer of this responding Defendant, except to admit that he is a member of the State Bar of Texas, Bar Card Number 24057009. To the extent a further answer may be required, the allegations contained therein are denied in their entirety.

34. The allegations contained in Section VII, Fifth Claim for Relief, numbered paragraphs 318-324 are denied in their entirety.

35. The allegations contained in Section VII, Sixth Claim for Relief, numbered paragraphs 332-352 require no answer of this responding Defendant. To the extent a further answer may be required, the allegations contained therein are denied in their entirety.

36. The allegations contained in Section VII, Seventh Claim for Relief, numbered paragraphs 353-372 require no answer of this responding Defendant, except to admit that Plaintiff filed a grievance case against him which was dismissed by the State Bar of Texas. To the extent a further answer may be required, the allegations contained therein are denied in their entirety.

37. The allegations contained in Section VII, Eighth Claim for Relief, numbered paragraphs 373-392 require no answer of this responding Defendant, except to admit that Plaintiff filed a grievance case against him which was dismissed by the State Bar of Texas. To the extent a further answer may be required, the allegations contained therein are denied in their entirety.

38. The allegations contained in Section VII, Eighth Claim for Relief, numbered paragraphs 373-392 require no answer of this responding Defendant, except to admit that Plaintiff filed a grievance case against him which was dismissed by the State Bar of Texas. To the extent a further answer may be required, the allegations contained therein are denied in their entirety.

39. The allegations contained in Plaintiff's Prayer for Relief, numbered paragraphs 393-401 require no answer of this responding Defendant. To the extent a further answer may be required, the allegations contained therein are denied in their entirety.

WHEREFORE, Defendant William A. Pigg prays that this, his Original Answer, be deemed good and sufficient in law and that after due proceedings are had, there be judgment herein in favor of Defendant William A. Pigg and against Plaintiff, Conghua Yan, dismissing his claims in their entirety, and for all general and equitable relief.

Respectfully Submitted

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s/ William A. Pigg

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CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing on Plaintiff Conghua Yan by email at arnold200@gmail.com this 9th day of September, 2023.

/s/ William A. Pigg